

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

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CASE NO. 11-00543-BKT

JOSE A CORREA ORTIZ

WANDA SERRANO RAMOS

Debtor(s)

CHAPTER 13

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MOTION TO RESIGN LEGAL REPRESENTATION

TO THE HONORABLE COURT:

NOW COMES the above named debtor through the undersigned attorney and very respectfully pray and allege:

1. That the undersigned is the attorney of record in the above captioned case.

2. That irreconcilable differences have arisen between debtor and attorney, and debtor has requested that the undersigned resign to this case.

3. That due to this situation the undersigned cannot continue representing debtor and prays to be released as attorney of record.

4. The undersigned prays that the trustee disburse to the undersigned the compensation approved by the court for attorney's fees as all the work was completed in debtor's case up to this date.

WHEREFORE it is respectfully requested that this Honorable Court take notice of the above and grant this motion.

I CERTIFY that on this date I sent by electronic mail a true copy of this motion to Trustee Alejandro Oliveras, Esq. and, by regular mail to parties in interest and to creditors as per master address list.

In San Juan, Puerto Rico, this June 29, 2011.

14 DAYS NOTICE

TO ALL PARTIES IN INTEREST:

WITHIN fourteen (14) days after services as evidenced by the Certification and an additional three (3) days pursuant to Federal Rules

of Bankruptcy Procedure 9006(f) if your were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless; (i) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

In San Juan, Puerto Rico, this June 29, 2011

I CERTIFY that on this date I electronically mailed a true copy of this motion to trustee Alejandro Oliveras, Esq., to Carlos Sosa Padro Esq., attorney for Scotiabank and by regular mail to parties in interest as per master address list.

/s/WILLIAM DAVILA DE PEDRO
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